

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

ERIK MATTSON, individually and on)	
behalf of all others similarly)	
situated,)	No. 3:18-cv-00989-YY
)	
Plaintiff,)	August 5, 2021
)	
v.)	Portland, Oregon
)	
QUICKEN LOANS INC.,)	
)	
Defendant.)	

TRANSCRIPT OF PROCEEDINGS

(Discovery hearing by teleconference)

BEFORE THE HONORABLE YOLEE YIM YOU
UNITED STATES DISTRICT COURT MAGISTRATE JUDGE

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1 (August 5, 2021, 9:01 a.m.)

2 **P R O C E E D I N G S**

3
4 THE COURT: Good morning, counsel. This is Judge You.
5 We are on the record in Mattson v. Quicken loans, Case Number
6 3:18-cv-989.

7 Let me begin by asking if we have plaintiff's counsel
8 on the phone.

9 MS. MONTGOMERY: Yes, Your Honor. This is Leigh
10 Montgomery for Plaintiff Erik Mattson.

11 MS. MARSHALL: And this is Amanda Marshall for
12 Plaintiff Erik Mattson.

13 THE COURT: Thank you. Anyone else? Okay.

14 All right. Then let me move to Quicken Loans. Who's
15 representing Quicken today?

16 MR. TAYMAN: Good morning, Your Honor. This is Kyle
17 Tayman for Quicken Loans.

18 MR. LAURICK: And James Laurick is also on the line
19 here, Your Honor. I'm local counsel for Quicken Loans.

20 MR. BROWN: And Brooks Brown, Your Honor.

21 THE COURT: Okay. Thank you. Do we have local counsel
22 for -- oh, yes, we do. Of course, Miss Marshall. All right.

23 Okay. So we are here, as you know, to discuss the
24 scheduling and discovery issues that you so thoroughly and
25 clearly articulated in your joint statements. I really

1 appreciate that.

2 So let me begin by asking if you saw the order that the
3 court issued, if everyone saw the order that the court issued in
4 the *New Penn* case staying all proceedings in this case until the
5 Ninth Circuit Court of Appeals' disposition of plaintiff's Rule
6 23(f) petition? Does that -- is that language that everyone --
7 or is that something that everyone agrees should be entered in
8 this case?

9 MR. TAYMAN: This is Kyle Tayman, Your Honor. This is
10 Kyle Tayman for Quicken Loans. I'll respond on behalf of Quicken
11 Loans.

12 Yes, Your Honor, we did see that order. And pursuant
13 to our statement in the joint status report and our prior
14 scheduling submission from September, we agree that class
15 certification proceedings and discovery in class should be stayed
16 pending the resolution of *New Penn*, however, we think we -- we
17 should be entitled to continue to proceed with discovery on
18 Mr. Mattson's individual claim in order to resolve the remaining
19 fact disputes from summary judgment, and also we should be
20 allowed to pursue a renewed motion for summary judgment to
21 address the issues falling from Judge Hernandez' order denying
22 our motion, because we think, one, we can resolve those fact
23 disputes, and two, that there were predicate issues that the
24 Court did not reach based on pleading or because we addressed
25 other arguments that are still ripe for decision and can be

1 resolved on summary judgment, and if not resolved, would greatly
2 benefit the sufficiency of trial.

3 And as we made clear, Mr. Mattson has said he fully
4 intends to pursue his individual claim no matter the outcome of
5 the *New Penn* appeal. So we do believe that discovery should go
6 forward on Mr. Mattson's individual claim as well as we should be
7 allowed to pursue the renewed motion for summary judgment.

8 THE COURT: Sure. I understand, and we'll get to that
9 issue in just a moment. I just wanted to confirm that everyone
10 was on the same page about staying this case until that
11 certification issue or the ultimate appeal was resolved by the
12 Ninth Circuit.

13 MS. MONTGOMERY: Your Honor, on behalf of plaintiff,
14 this is Leigh Montgomery. We obviously are in favor of a stay
15 pending this appeal and its resolution in the Ninth Circuit.

16 THE COURT: Okay. Thank you.

17 So let me move, then, to the discovery issue. And back
18 to Mr. Tayman, I understand that you are seeking some additional
19 discovery with respect to the tax issue. Could you describe
20 specifically what it is that you are seeking in terms of
21 additional discovery? What are you proposing?

22 MR. TAYMAN: Yes. Kyle Tayman for Quicken Loans again.
23 Yes, Your Honor. We're seeking to just clarify the fact of
24 whether Westland Investors deducted for purposes of federal and
25 state tax law the expenses of the cellphone line and cellphone at

1 issue in this case. The Court denied our motion for summary
2 judgment, claiming there was a dispute of fact as to whether or
3 not it's a business line. And in denying *New Penn's* similar
4 motion for summary judgment, the Court specifically relied on
5 Mr. Mattson's testimony that he believed his company did deduct
6 it, but was not certain.

7 And so we believe resolution of that issue will greatly
8 aid the Court in resolving summary judgment. And even if there
9 is a fact dispute somehow still after that, it would greatly aid
10 any trial, because we will resolve this issue and avoid the need
11 for additional witnesses and testimony at trial.

12 So in February, Your Honor, we served Mr. Mattson with
13 limited and targeted discovery on this issue. Specifically, we
14 served nine requests for admissions on whether Westland deducted
15 the phone and business line as a -- as a tax deduction, and then
16 we separately served nine requests for admissions on the payment
17 of the -- of the phone and the telephone line that we think are
18 undisputed facts based on Mr. Mattson's testimony, and we just
19 want to simplify that for trial.

20 And we also -- just for clarity, we also served two
21 additional requests for admissions on Quicken Loans policies and
22 procedures as to Count 2, which, again, we think the Court
23 already found were undisputed as a matter of fact, and we want to
24 avoid that issue for trial.

25 We served at the same time, four interrogatories asking

1 Mr. Mattson to identify the Westland employees or owners
2 responsible for the federal and state tax reporting, and asking
3 Mr. Mattson to identify Westland's accountants and to identify
4 his own accountant, again, so that we can understand this issue
5 of were the -- was the business -- was the cellular line and the
6 phone deducted as a business expense for tax purposes.

7 And then we served two document requests for any
8 document Mr. Mattson relied upon to answer those requests for
9 admission or interrogatories.

10 There were some other discovery, Your Honor, that we
11 served at the same time concerning class, and the parties are in
12 agreement that does not need to be answered at this time.

13 So, again, we served that in February. Mr. Mattson
14 responded in March with objections only. He did not answer any
15 of them. His primary objection was that individual merits
16 discovery was closed.

17 We met and conferred with his counsel on March 26.
18 They would only discuss the issue of whether or not merits
19 discovery was open, and refused to discuss their other
20 objections, which included relevancy and the claim that somehow
21 this discovery is not within Mr. Mattson's possession, custody,
22 or control, that it is only within Westland's.

23 And that brought us to the present dispute, where we
24 have not been able to advance this for the past six months since
25 the discovery has been served.

1 THE COURT: All right. Thank you, Counsel.

2 Let me tell you that -- and, of course, I want to hear
3 from plaintiff as well, but let me tell you that I'm inclined to
4 allow additional discovery on this issue so that it could be
5 presented at trial, but I'm not inclined to allow another motion
6 for summary judgment, because my findings and recommendations
7 discussed specifically Mattson's belief that Westland deducts the
8 cost of his phone and phone service. And in spite of that, Judge
9 Hernandez found that on the facts in the record, a reasonable
10 jury could conclude that the subject number is a residential
11 number.

12 So I just don't think it's going to make any difference
13 in terms of summary judgment to present evidence that, in fact,
14 Westland does deduct this line. I think that based on what I'm
15 seeing in the F&R and Judge Hernandez' -- Chief Judge Hernandez'
16 order declining to adopt the F&R, that it's an issue that was
17 before the Court already, although maybe not as specifically, and
18 I think that it would be redundant and not -- and also burdensome
19 on the plaintiff to have to relitigate that issue.

20 However, I think that while we're in this state of --
21 while we're in -- while we're experiencing somewhat of a delay, I
22 think that it's reasonable to allow discovery on that issue so
23 that ultimately the trier of fact can decide whether this is a
24 residential number or not.

25 So let me -- with that -- with those thoughts in mind,

1 let me turn to plaintiff's counsel to see what your thoughts are.

2 MS. MONTGOMERY: So of course we agree with Your Honor
3 about the summary judgment issues, and believe that the previous
4 order on summary judgment was clear that there was -- there's a
5 factual dispute here.

6 As far as the discovery requested, really plaintiff's
7 issue is the lack of clarification on the scheduling and what
8 discovery is open, what is available, and what they are allowed
9 to serve and do. And if it's just answer the -- fully the
10 written discovery, we just want an order from the Court, or would
11 request an order from the Court clarifying just this, you know,
12 written discovery is allowed or whether it's open on all of
13 discovery again, because we did have lengthy discovery and a
14 lengthy deposition on these issues.

15 And I do understand that the -- you know, Judge
16 Hernandez' order makes clear it was not an -- it was not
17 conclusively established as to whether the business deducted the
18 expense, and I do understand that that issue may come up later.

19 I'm trying to understand what the schedule is of
20 discovery and whether it's just answer this -- these written
21 questions, as counsel has set forth in their joint status report,
22 or whether they're seeking to go further.

23 And one issue in particular is concerning, because the
24 interrogatory request only asks for identification of
25 individuals. To me, that says, "Now I want to depose those

1 individuals," instead of, "I just want to serve this discrete
2 discovery that is to clear up one factual issue that was
3 remaining after lengthy individual merits discovery already
4 concluded."

5 So that's -- that's plaintiff's position, is just to
6 get some clarity from the Court as to the scope of what we're
7 going to do moving forward, if anything, on the individual claim.

8 THE COURT: And turning back to Mr. Tayman, you listed
9 a number of different requests that you were making with respect
10 to discovery, and I'm not sure I was able to take notes quickly
11 enough to catch everything it was that you were requesting. So I
12 guess my -- I guess my -- my question really is where the dispute
13 lies between the parties in terms of what additional discovery
14 would be allowed.

15 So assuming I'm not going to allow additional motion
16 practice, to what extent are you unable to resolve the issue of
17 additional discovery on the, as Mr. Tayman described, limited and
18 targeted issue?

19 MS. MONTGOMERY: Are you asking plaintiff's counsel?
20 This is Leigh Montgomery.

21 THE COURT: Well, I'm asking -- I guess I'm asking both
22 of you if -- where the dispute lies and if it's something that
23 you cannot resolve.

24 I hear from Ms. Montgomery that you need some -- you
25 wanted the Court to order some -- before acquiescing to it, you

1 needed some -- you wanted some order from the Court.

2 So I don't want to micromanage, is basically what I'm
3 trying to say. If you can -- if I'm going to allow some limited
4 and targeted discovery on the question of whether this was a
5 deducted expense for tax purposes, with that in mind, is -- can
6 you work out the parameters to what -- regarding what it is that
7 defendants are asking -- defendant is asking for or do you need
8 further help from me?

9 MS. MONTGOMERY: I -- well, I guess the question would
10 be more for the defendant if the -- if the request, the written
11 discovery request is the extent of the discovery that they want
12 to pursue and the Court is going to, as I assume, issue some --
13 some sort of order today allowing for that written discovery. If
14 that's all that defendants want to pursue, the ones that they've
15 already served, then, no, I don't think we have a dispute on
16 that.

17 And like I said, it was just getting some clarity on
18 what we're doing since the last order had closed the individual
19 merits, but understanding Your Honor's position, if it's -- if
20 Quicken Loans' only goal was to get answers to the discovery that
21 he outlined and has already served in February, then we don't
22 have a dispute over that. The dispute would be on what else they
23 may want to do.

24 THE COURT: Okay. Thank you.

25 Turning back to Mr. Tayman.

1 MR. TAYMAN: Yes. Kyle Tayman for Quicken Loans.

2 Your Honor, I -- hearing what Miss Montgomery said, it
3 seems that we would have agreement on that, that we want the
4 written discovery served, answered.

5 With respect to needing the Court's assistance, one of
6 the objections that plaintiff raised in that discovery was
7 claiming he doesn't have possession, custody, or control over the
8 information as to whether his company deducted it for federal and
9 state tax purposes. And if that's going to be -- if they're
10 going to stand on that objection, we would need the Court's
11 assistance, because we think it's inconsistent for Mr. Mattson to
12 tell this Court that he fictionally paid for the phone line
13 because he's one-third owner of the company, even though he
14 didn't actually pay for it, and then tell the Court that he can't
15 answer this discovery because it's not in his possession,
16 custody, or control.

17 If he's going to take that position, then we would be
18 forced to either get this Court's help or pursue a Rule 45
19 subpoena to Westland Investors, but we think it's inconsistent
20 with positions he's already taken to this Court to claim now that
21 he doesn't have possession, custody, or control over this,
22 particularly when he's already produced documents from Westland
23 during the normal course of discovery. So if that's not going to
24 be an issue, I think we can resolve this with the written
25 discovery.

1 We do not anticipate at this time taking -- serving any
2 additional written discovery or other third-party discovery.
3 That's, of course, subject to seeing what the answer is from
4 Mr. Mattson, because, again, if he's claiming he doesn't know or
5 that the information's with his accountant, then we would have to
6 go potentially get that, but we don't -- you know, we are hopeful
7 that the answers would resolve this once and for all and that we
8 wouldn't need the Court's additional assistance. Um --

9 THE COURT: All right. I understand. Did you want to
10 say something else?

11 MR. TAYMAN: Yes, Your Honor. Again, Kyle Tayman for
12 Quicken Loans.

13 I did want to just briefly address the Court's position
14 on renewing motion for summary judgment. We would respectfully
15 ask that the Court at least reserve judgment on whether or not
16 we'd be allowed to do that until we get this discovery, because I
17 would remind the Court that in the *New Penn* ruling, Judge
18 Hernandez determined there was two disputes of fact. He said
19 there was a dispute of fact as to whether or not Westland
20 Investors deducted the phone line as a -- for tax purposes, and
21 that's what we were trying to resolve. And then he subsequently,
22 based on that and other evidence, determined there's a dispute of
23 fact as to whether it was a residential or business line.

24 Even putting that aside, the court also did not reach
25 our affirmative defense on Count 1, because he concluded that we

1 did not allege that the calls were a result of an error until our
2 reply brief. And he did not deny our motion on that ground with
3 prejudice, so we think there would be an opportunity to renew
4 that, and we think it would be beneficial for the Court to
5 resolve that issue, which really is a question of law, in advance
6 of trial and it would certainly benefit the trial and the fact
7 finder.

8 And then also with respect to our renewed motion for
9 summary judgment, Your Honor, on Count 2, Your Honor denied --
10 recommended denial based on the determination that Mr. Mattson
11 had not -- had not revoked his consent, and Judge Hernandez
12 reversed.

13 However, we had another argument that was never reached
14 because of that, which is that as a matter of law, and this was
15 undisputed by Mr. Mattson, and Judge Hernandez and you both found
16 that this was undisputed, that we've implemented the proper
17 policies and procedures under the regulations, and that's
18 sufficient to defeat his claim in Count 2. So that was never
19 reached fully by the Court. So we do think there would be reason
20 here to renew a motion for summary judgment.

21 And in our December submission, we did cite case law
22 under the Ninth Circuit, including the *Hoffman v. Tonnemacher*
23 case from 2010, where the Ninth Circuit does promote successive
24 motion for summary judgment, particularly where there's an
25 expanded factual record.

1 So we would ask, at least at the minimum, the Court
2 reserve judgment as to whether or not we'd be allowed to pursue a
3 renewed motion until after this fact dispute is resolved, and at
4 that time, we could ask the Court for permission to come back and
5 let you know where we are and see if that would change the
6 Court's determination whether or not we should be allowed to do
7 that.

8 THE COURT: I understand what you're arguing here. The
9 way I see it is that this question of whether the phone was
10 deducted has always been at issue. It's not a new issue that the
11 parties were unaware of. I mean, Mr. Mattson has been asked
12 about it and it was the subject of debate with respect to the
13 motion for summary judgment.

14 And so what I -- what I'm concerned about is that --
15 well, let me back up and say so that's one -- one, I think,
16 important factor, is that this is not some new thing that people
17 were unaware of. And I'm going to allow additional discovery on
18 this issue, because I think that ultimately the fact finder needs
19 to make some determinations about it, but to reopen the motion
20 for summary judgment when it was clear that dispositive motions
21 were to be filed by a particular day, I think, would be
22 fundamentally unfair to the plaintiff due to the additional
23 expense, time.

24 Of course, as cases evolve, issues or -- as cases
25 evolve, issues receive, I think, more clarification. And there,

1 I think, are extraordinary circumstances where -- or I shouldn't
2 say "extraordinary."

3 To deviate from the scheduling order, there has to be
4 good cause, and -- and I guess in sum, I just don't find that
5 here where, as I said, this is an issue that people were aware of
6 at the time of the dispositive motion deadline.

7 If there was some new evidence or something to that
8 effect on an issue that the parties were unaware of, then, you
9 know, that's a different story, but we have to be mindful of the
10 purpose of the scheduling order and the effect that it can have
11 on the other party to allow repeated dispositive motions, and --
12 and so that's how I see it under these circumstances.

13 So I'm not going to issue an order that allows you to
14 renew the motion that you're making right now, or the request
15 that you're making right now after discovery has been completed,
16 because I just don't see how things are going to change, based on
17 what you have said.

18 Okay. So then on the issue of discovery with respect
19 to the tax deduction, the written discovery that Quicken Loans
20 has identified will be permitted.

21 As for whether any additional discovery will be
22 allowed, that is something that Quicken can come back to the
23 Court with -- I'm not going to foreclose that option, because I
24 just don't know -- because Quicken Loans doesn't know at this
25 point what the responses are going to be.

1 Okay. Anything else --

2 MS. MONTGOMERY: Yes, Your Honor.

3 THE COURT: -- that the parties would like to discuss
4 today?

5 MS. MONTGOMERY: No, Your Honor.

6 MR. BROWN: Your Honor, this is Brooks Brown. Just one
7 question as to the timing for the plaintiffs to respond to that,
8 that discovery has been outstanding for some time now.

9 THE COURT: Well, sure. Of course, today is the day
10 that they found out they need to, so --

11 MR. BROWN: Yes. Fair enough.

12 THE COURT: So Miss Montgomery, were you going to
13 respond?

14 MS. MONTGOMERY: Yes. If we could have 2 weeks to get
15 our responses in order. We're having -- as the defendant pointed
16 out, we're having to try to reach out to, you know, more than
17 just my client. It's not just Mr. Mattson. So we would
18 appreciate if we could have 2 weeks for those responses.

19 THE COURT: Two weeks sounds completely reasonable to
20 me. Any objection by Quicken Loans?

21 MR. TAYMAN: No objection from Quicken Loans.

22 THE COURT: Okay. And it was a good point to clarify
23 when that would be completed, so I do appreciate that you
24 mentioned it.

25 Okay. Anything else to discuss today?

1 MS. MONTGOMERY: Nothing for plaintiff, Your Honor.

2 MR. TAYMAN: Kyle Tayman for Quicken Loans. Nothing
3 from us, Your Honor.

4 THE COURT: Okay. Thank you very much.

5 MR. TAYMAN: Thank you, Your Honor.

6 THE COURT: I hope everyone has a productive remainder
7 of the day.

8 We'll be adjourned. Thank you.

9 MS. MONTGOMERY: Thank you.

10 (Proceedings concluded at 9:27 a.m.)

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C E R T I F I C A T E

I certify by signing below that the foregoing is a true and correct transcript of the record, taken by stenographic means, to the best of my ability, of the telephonic proceedings in the above-entitled cause.

Due to the telephonic connections of parties appearing via videoconference, speakerphone, or cell phone, speakers talking over one another, speakers failing to enunciate, speakers not identifying themselves before they speak, and/or other technical difficulties that occur during telephonic proceedings, this certification is limited by the above-mentioned reasons and any technological difficulties of such proceedings occurring over the telephone.

A transcript without an original signature, conformed signature, or digitally-signed signature is not certified.

DATED this 26th day of August, 2021.

/s/ Kellie M. Humiston

Kellie M. Humiston, RMR, CRR
Official Court Reporter
Certificates Expire: 9/2021

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